

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

ERNEST G. COOK,

Plaintiff,

vs.

TRUMBULL COUNTY, et al.,

Defendants.

) CASE NO.: 4:22-CV-00077-BYP

)

) JUDGE: BENITA PEARSON

)

) **NOTICE OF DISCOVERY DISPUTE**

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Now comes Defendant, Board of Trumbull County Commissioners, by and through counsel, and gives notice of a discovery dispute relating to a single topic identified in Plaintiff's Notice of Deposition of Defendant's Representative Pursuant to Rule 30(b)(6). Counsel for both parties have consulted repeatedly and resolved all disputed topics except this one:

10. The basis of each complaint, Charge, and/or lawsuit filed against Niki Frenchko, Trumbull County, and/or any or all of the Commissioners of Trumbull County since Niki Frenchko took office.

Respectfully submitted,

MAZANEC, RASKIN & RYDER CO., L.P.A.

s/Kathleen M. Minahan

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*Counsel for Defendant Board of Trumbull County
Commissioners*

CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2023, a copy of the foregoing Notice of Discovery Dispute was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Kathleen M. Minahan

KATHLEEN M. MINAHAN (0064989)

EDMOND Z. JABER (0096355)

*Counsel for Defendant Board of Trumbull County
Commissioners*